ATTACHMENT C INSPECTION PLAN

Document: LANL TA-54 Renewal
Revision No.: 3.0

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LIST OF ABBREVIATIONS/ACRONYMS

20.4.1 NMAC New Mexico Administrative Code, Title 20, Chapter 4, Part 1

CFR Code of Federal Regulations

LANL Los Alamos National Laboratory

m³ cubic meters

ppmw parts per million by weight

TA technical area
TRU transuranic

TRUPACT-II Transuranic Package Transporter-II

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In accordance with the New Mexico Administrative Code, Title 20, Chapter 4, Part 1 (20.4.1 NMAC), § 270.14(b)(5), and 20.4.1 NMAC § 264.15, revised June 14, 2000 [6-14-00], inspection requirements for all hazardous and/or mixed waste management units at Los Alamos National Laboratory (LANL) are addressed in Appendix C of the most recent version of the "Los Alamos National Laboratory General Part B Permit Application," hereinafter referred to as the LANL General Part B. This attachment presents additional inspection requirements specific to the container storage units at Technical Area (TA) 54. Inspections will be conducted often enough to identify problems in time to correct them before they harm human health or the environment.

C.1 INSPECTION REQUIREMENTS FOR TRUPACT-II CONTAINERS [20.4.1 NMAC §§ 264.15(b) and 264.174]

Transuranic Package Transporter-II (TRUPACT-II) containers will be used to store transuranic (TRU) and mixed TRU waste containers prior to shipment from TA-54 West to the Waste Isolation Pilot Plant. These double containment, stainless-steel shipping containers are designed to contain up to 14 drums, two rounded-end standard waste boxes, or one ten-drum overpack.

TRUPACT-II containers are intended to store only waste containers of structural integrity. Waste containers will be visually inspected prior to their placement in the TRUPACT-II containers to ensure their integrity. The inspection will include a close examination of the cover and closure devices for visible cracks, holes, gaps, or other open spaces into the interior of the waste container when the cover and closure devices are secured in the closed position. The TRUPACT-II will be loaded with waste containers and sealed with a locking-ring closure mechanism. After the TRUPACT-II has been sealed, only the outside of the TRUPACT-II will be inspected to ensure its integrity and that there has been no human intervention.

C.2 <u>INSPECTION AND MONITORING FOR UNITS SUBJECT TO SUBPART CC</u> REQUIREMENTS [20.4.1 NMAC, Subpart V, Part 264, Subpart CC]

The hazardous wastes stored in containers at TA-54 may be subject to 20.4.1.500 NMAC (incorporating the Code of Federal Regulations [CFR], Title 40, Part 264, Subpart CC, "Air Emission Standards for Tanks, Surface Impoundments, and Containers") based on the applicability criteria specified in 40 CFR § 264.1080. Subpart CC standards for containers, as currently set forth by the

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U.S. Environmental Protection Agency, require that containers of hazardous waste be covered so that there are no detectable emissions of volatile organic compounds to the air. Inspection and monitoring requirements are also specified.

As indicated in 40 CFR § 264.1080(b)(6), these standards are not currently applicable to containers that are used solely for management of radioactive mixed waste in accordance with all regulations under the authority of the Atomic Energy Act and the Nuclear Waste Policy Act. The standards are also not applicable to containers of hazardous waste with less than 500 parts per million by weight (ppmw) volatile organics, containers of less than 0.1 cubic meters (m³) (approximately 26 gallons) capacity, or that have received waste prior to the effective date of the regulation (December 6, 1996). The following management standards apply for hazardous wastes managed at LANL that do not meet any of the exemptions listed in 40 CFR §264.1080(b).

LANL requires that Subpart CC requirements be evaluated by the generator as part of the waste characterization process. Generator information is used to determine whether the concentration of volatile organics in a waste stream at the point of generation is equal to or greater than 500 ppmw, which is the threshold concentration for Subpart CC requirements. The generator documents this determination for that waste stream. In the event that this information is not available, the waste will be characterized in accordance with Appendix B of the LANL General Part B prior to being received by TA-54. Any hazardous waste that is newly-generated through the treatment or recharacterization of mixed waste at TA-54 will be characterized for the volatile organic content in accordance with Appendix B.

Three levels of air emission controls based on container design capacity are established in 40 CFR § 264.1086(b). TA-54 hazardous waste storage procedures require Level 1 controls based upon container design capacities. Containers of greater than 0.1 m³ and less than 0.46 m³ (approximately 119 gallons) capacity and that meet U.S. Department of Transportation specifications under 49 CFR, Part 178, are kept closed during storage pursuant to 40 CFR § 264.1086(c)(3). Containers undergoing waste characterization activities may be opened for access for the purposes described in 40 CFR § 264.1086(c)(3). As required by 40 CFR § 264.1086(c)(4), these containers are subject to a visual inspection and monitoring program. On or before acceptance of the waste container at TA-54, the container is inspected to check for visible cracks, holes, gaps, or other open spaces into the interior of the container when the cover and closure devices are secured in the closed position, in accordance with 40 CFR § 264.1086(c)(1)(ii). This

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inspection is documented in uniform hazardous waste manifests. Pursuant to the Inspection Plan in Appendix C of the LANL General Part B, the containers are inspected weekly at TA-54 to ensure that the containers remain closed during storage, thereby exceeding the monthly inspection requirements of 40 CFR § 264.1086(c)(4)(ii).